



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

October 29, 2013

JAMES LIU, TREASURER
H.J. HEINZ COMPANY POLITICAL ACTION
COMMITTEE
1 PPG PLACE, SUITE 3100
PITTSBURGH, PA 15222

Response Due Date
12/03/2013

IDENTIFICATION NUMBER: C00336040

REFERENCE: JULY QUARTERLY REPORT (04/01/2013 - 06/30/2013)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 2 item(s):

1. Schedule B of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. Please be advised that 2 U.S.C. §441a(a) prohibits a multicandidate committee and its affiliates from making a contribution to a candidate for federal office in excess of \$5,000 per election.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

If any contribution you made exceeds the limits, you must request a refund of the excessive amount or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund of the excessive amount.

Please inform the Commission of your corrective action promptly in writing and provide a photocopy of the refund or redesignation request sent to the

H.J. HEINZ COMPANY POLITICAL ACTION COMMITTEE

Page 2 of 3

recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. (11 CFR §110.1(b))

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration. (11 CFR §103.3(b)(1) and (3))

2. For your information and consideration for future filings, Schedule B supporting Line 23 of your report discloses a contribution(s) to several candidates designated for "Primary 2013". However, Primary elections for Federal offices are not being held in this State(s)/district(s) during 2013. Contributions not designated for a valid election will be attributed to the next election for Federal office in which the candidate is participating. (11 CFR §§ 110.1(b)(2) and 110.2(b)(2)) For future filings, please include valid election designation(s) if applicable.

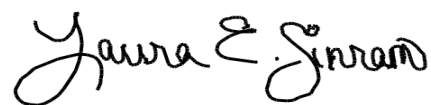
Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1157.

H.J. HEINZ COMPANY POLITICAL ACTION COMMITTEE

Page 3 of 3

Sincerely,

A handwritten signature in black ink that reads "Laura E. Sinram". The signature is written in a cursive style with a large, stylized "L" and "S".

Laura Sinram
Sr. Campaign Finance & Reviewing Analyst
Reports Analysis Division

Excessive, Prohibited, and Impermissible Contributions
H.J. Heinz Company Political Action Committee (C00336040)

Excessive Contributions Made with an Affiliate(s) to a Candidate

Recipient Name	Date	Amount	Election	Report	Contributing Affiliate
Braley For Congress	2/4/13	\$5,000.00	P2014	2013 March Monthly	C00235739
Braley For Congress	6/27/13	\$1,000.00	*P2014	2013 July Quarterly	C00336040
Jim Risch For U S Senate Committee	2/8/10	\$1,000.00	*P2014	2010 April Quarterly	C00324483
Jim Risch For U S Senate Committee	3/29/12	\$5,000.00	*P2014	2012 April Quarterly	C00336040
Jim Risch For U S Senate Committee	6/27/13	\$1,000.00	*P2014	2013 July Quarterly	C00336040
Tim Scott For Senate	5/9/13	\$5,000.00	*P2014	2013 June Monthly	C00235739
Tim Scott For Senate	6/27/13	\$1,000.00	*P2014	2013 July Quarterly	C00336040

*Schedule B of the report discloses this contribution as designated to an election in which this candidate did not participate. Therefore, this contribution has been attributed to the next scheduled Federal election for this candidate, the 2014 Primary (11 CFR §110.2(b)(ii)).